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15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA,  
17 SAN FRANCISCO DIVISION

18  
19 GOOGLE LLC,  
20 Plaintiff and Counter-defendant,  
21 v.  
22 SONOS, INC.,  
23 Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**SONOS, INC.'S ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rule 79-5(f), Sonos, Inc. (“Sonos”) hereby respectfully submits  
 3 this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed  
 4 (“Administrative Motion”) in connection with Sonos, Inc.’s Motion For Leave To Amend  
 5 Infringement Contentions Pursuant To Patent L.R. 3-6 (“Sonos’s Motion for Leave to Amend”).  
 6 Specifically, Sonos seeks to file under seal the information and/or document(s) listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Sonos’s Motion for Leave to Amend	Portions highlighted in green	Google
Exhibit 2 to the Declaration of Geoffrey Moss in Support of Sonos, Inc.’s Unopposed Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R. 3-6 (“Declaration of Moss”)	Entire document	Google
Exhibit 3 to the Declaration of Moss	Entire document	Google
Exhibit 4 to the Declaration of Moss	Entire document	Google
Exhibit 5 to the Declaration of Moss	Entire document	Google
Exhibit 6 to the Declaration of Moss	Entire document	Google
Exhibit 7 to the Declaration of Moss	Entire document	Google
Exhibit 9 to the Declaration of Moss	Entire document	Google
Exhibit 10 to the Declaration of Moss	Entire document	Google
Exhibit 11 to the Declaration of Moss	Entire document	Google
Exhibit 12 to the Declaration of Moss	Entire document	Google

22 **II. LEGAL STANDARD**

23 Materials and documents may be provisionally filed under seal pursuant to Civil Local  
 24 Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by  
 25 another party or non-party.” *See* L.R. 79-5(f).

26 **III. GOOGLE LLC’S CONFIDENTIAL INFORMATION**

27 Sonos seeks to seal the information and/or document(s) listed in the above table because  
 28 they may contain information that Google considers Confidential and/or Highly Confidential-

1 Attorneys' Eyes Only and/or Highly Confidential-Source Code pursuant to the Protective Order  
2 entered by this Court. Dkt. 92. Sonos takes no position on the merits of sealing Google's  
3 designated material, and expects Google to file one or more declarations in accordance with the  
4 Local Rules.

5 **IV. CONCLUSION**

6 In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above-  
7 listed documents accompany this Administrative Motion and redacted versions are filed publicly.  
8 A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos  
9 respectfully requests that the Court grant Sonos's Administrative Motion.

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11 Dated: December 19, 2022

ORRICK HERRINGTON & SUTCLIFFE LLP  
and  
LEE SULLIVAN SHEA & SMITH LLP

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By: /s/ Alyssa Caridis  
Alyssa Caridis

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15 *Attorneys for Sonos, Inc.*

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